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8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 United States of America,

12 Plaintiff,

13 v.

14 Esperanza Sanabria-Araujo,

15 Defendant.  
16

Case No. 2:19-cr-251-GMN-NJK-2

**Unopposed Motion to Modify  
Conditions of Pretrial Release**

17 The defendant, Esperanza Sanabria-Araujo, by and through her counsel of  
18 record, Katherine Tanaka, Assistant Federal Public Defender, files this Unopposed  
19 Motion to Modify Conditions of Pretrial Release. This request is based on the  
20 Points and Authorities attached hereto.

21 DATED this 1<sup>st</sup> day of April, 2020.

22 RENE L. VALLADARES  
23 Federal Public Defender

24 By: /s/Katherine Tanaka

25 KATHERINE TANAKA  
Assistant Federal Public Defender  
Attorney for Esperanza Sanabria-  
26 Araujo

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2) Mrs. Sanabia requests that the location monitoring condition (and its sub-conditions) be removed. She has been subject to location monitoring for approximately six months. She has been fully compliant with that condition as well as all her other conditions.

5) Defense counsel has also been in contact with the government.  
Government counsel similarly has no opposition.

Respectfully submitted,

By: /s/*Katherine Tanaka*

<sup>1</sup> ECF No. 24.

<sup>2</sup> *Id.* (conditions 50A, 51D, 52, and 53).

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA  
3

4 United States of America,  
5 Plaintiff,

6 v.

7 Esperanza Sanabia-Araujo,  
8 Defendant.  
9

Case No. 2:19-cr-251-GMN-NJK-2

**PROPOSED ORDER**

10  
11 IT IS ORDERED that Mrs. Sanabia's pretrial release conditions shall be  
12 modified to remove her location monitoring conditions (50A, 51D, 52, and 53).

13 DATED this <sup>2nd</sup> day of April 2020.  
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16 UNITED STATES MAGISTRATE  
17 JUDGE  
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